

Melissa G. Johnson, #16601
Lyndzie M. Carter, #25773
Assistant Attorney General
120 SW 10th Avenue, 2nd Floor
Topeka, Kansas 66612-1597
Tel: 785.296.2215
Fax: 785.291.3875
Melissa.Johnson@ag.ks.gov or
Lyndzie.Carter@ag.ks.gov

FILED BY FAX

4-24-15 @ 4:45 PM ecc

**IN THE DISTRICT COURT OF HODGEMAN COUNTY, KANSAS
TWENTY FOURTH JUDICIAL DISTRICT**

STATE OF KANSAS,
Plaintiff,

v.

KODY HANSON,
F/K/A KODY SANCHEZ,
Defendant.

Case No. 2015 CR 13

COMPLAINT / INFORMATION

COMES NOW the State of Kansas, by and through Derek Schmidt, Kansas Attorney General and Melissa G. Johnson and Lyndzie M. Carter, Assistant Attorneys General, and for its Complaint/Information against the Defendant above-named, alleges and states:

COUNT 1

FIRST DEGREE FELONY MURDER

**K.S.A. 21-5402(a)(2)
Off-grid Person Felony**

That on or about April 7, 2015, within Hodgeman County, Kansas, Kody Hanson, f/k/a Kody Sanchez did unlawfully and feloniously kill a human being, to wit: R.H. d/o/b xx/xx/2015, in the commission of, attempt to commit an inherently dangerous felony as defined in K.S.A. 21-5402(c) and amendments thereto, to wit: Abuse of a Child; in violation of K.S.A. 21-5402(a)(2); An Off-Grid Person Felony.

COUNT 2

ABUSE OF A CHILD

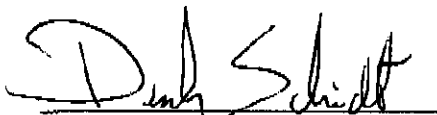
**K.S.A. 21-5602
Level 5 Person Felony**

That on or about April 7, 2015, within Hodgeman County, Kansas, Kody Hanson, f/k/a Kody Sanchez did unlawfully, feloniously and knowingly torture or cruelly beat a child, to-wit: R.H. d/o/b xx/xx/2015; or shake a child under the age of 18 years, to-wit: R.H., d/o/b/ xx/xx/2015, which resulted in great bodily harm to the child in violation of K.S.A. 21-3609; a Level 5 Person Felony.

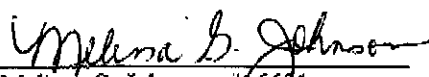
All of the above-said acts then and there committed being contrary to the statutes in such cases made and provided, and being against the peace and dignity of the State of Kansas.

Respectfully submitted,

OFFICE OF THE KANSAS ATTORNEY GENERAL
DEREK SCHMIDT



Derek Schmidt, #17181
Kansas Attorney General
120 SW 10th Avenue, 2nd Floor
Topeka, Kansas 66612-1597



Melissa G. Johnson, #6601
Assistant Attorney General
120 SW 10th Avenue, 2nd Floor
Topeka, Kansas 66612-1597
Ph.: (785) 296-6491
Fax: (785) 291-3875
Email: melissa.johnson@ks.ag.gov



Lyndie M. Carter, #25773
Assistant Attorney General
120 SW 10th Avenue, 2nd Floor
Topeka, Kansas 66612
Tel: (785) 291-3876
Fax: (785) 291-3875
lyndie.carter@ag.ks.gov
Attorneys for Plaintiff

Witness List:

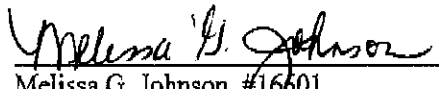
Dr. Bajracharya – Wesley Medical Center
Betty Bamberger
Vonda Berger
Dr. Carlson – Wesley Medical Center
Deputy Jeffrey Channell
Kimberly Cohoon


Kelsey Keese
Kari Kreger
Amanda Law
Dr. Jamie Oeberst – Wesley Medical Center
Charity O'Leary-Taylor
Marleen Penton
Det. Shaun Price – Wichita Police Department
Det. Purcell – Wichita Police Department
Lt. Travis – Wichita Police Department
Kirstie Rudzick
SSA Greg Skelton
Dr. R. Alan Snodgrass – Oshea Memorial Clinic
Ben Taylor
Melanie Vogts
Sheriff Jared Walker
Erin Washburn
Regan Weber
Det. Chris Zandler

VERIFICATION

STATE OF KANSAS)
) ss:
COUNTY OF SHAWNEE)

I, Melissa G. Johnson and Lyndzie Carter, of lawful age, being first duly sworn upon oath do solemnly swear, that the matters set forth in the foregoing Complaint / Information are, to the best of my knowledge and belief, true. So help me God.


Melissa G. Johnson, #16601
Assistant Attorney General


Lyndzie Carter, #25773
Assistant Attorney General

SUBSCRIBED TO AND SWORN TO before me this 24th day of April, 2015.



Brenda Albright
Notary Public